

RUTH A. HARVEY  
KIRK T. MANHARDT  
SHANE HUANG  
MINIARD CULPEPPER JR.  
J. ZACHARY BALASKO  
United States Department of Justice  
P.O. Box 875  
Ben Franklin Station  
Washington, DC 20044-0875  
Telephone: (202) 616-0341  
Email: shane.huang@usdoj.gov

Attorneys for the United States

**UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII**

UNITED STATES OF AMERICA, Plaintiff,  v.  SANDWICH ISLES COMMUNI- CATIONS, INC., et al., Defendants.	Civ. No. 18-145 JMS-RT
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**STIPULATION OF TRIAL PROCEDURES**

Plaintiff the United States, on behalf of the Rural Utilities Service of the United States Department of Agriculture, and Defendants Sandwich Isles Communications Inc. (“Sandwich Isles”), and Albert S.N. Hee, hereby stipulate to the following procedures during trial between the United States and Mr. Hee, set to begin on October 13, 2022.

1. All witnesses should be allowed (but not required) to submit their direct testimony by declaration, subject to live cross examination by opposing parties.
2. The parties may identify excerpts of any deposition taken in this case at any point prior to the close of that party's case-in-chief. The opposing party may counter-designate additional excerpts of any deposition taken in this case at any point prior to closing arguments, as set forth in paragraph 6 below. The parties' right to object to the deposition testimony is reserved and objections will be considered by the Court.
3. The parties agree that all exhibits previously disclosed can be admitted to evidence by consent, if offered, with the condition that any exhibit not disclosed by September 13, 2022, may only be used for impeachment or rebuttal. Expert Reports are stipulated into evidence only under the condition that the expert be available for live cross examination.
4. All parties stipulate that Count II is bifurcated, and that all deadlines that have already expired remain expired.
5. The United States will not object to counsel for Sandwich Isles sitting at

counsel table at trial, but may object to Sandwich Isles' counsel acting as Mr. Hee's attorney rather than as Sandwich Isles' attorney.

6. Unless the Court orders otherwise, closing arguments shall take place two days after the close of evidence. Prior to the start closing arguments, each party shall identify and move into evidence each deposition excerpt and exhibit identified pursuant to paragraphs 2 and 3 above. All exhibits and deposition testimony not admitted to evidence by the start of closing arguments will be deemed withdrawn.

7. Unless the Court orders otherwise, fourteen days after closing arguments the parties shall submit to the Court revised Findings of Fact and Conclusions of Law.

Date: October 12, 2022

BRIAN BOYNTON  
Principal Deputy Assistant Attorney  
General

RACHEL S. MORIYAMA #3802  
Civil Chief, District of Hawaii  
Attorney for the United States  
Acting under Authority Conferred by  
28 U.S.C. § 515

/s/Shane Huang  
RUTH A. HARVEY  
KIRK T. MANHARDT  
SHANE HUANG  
(Illinois Bar 6317316)  
MINIARD CULPEPPER JR.  
(MA BBO No. 693851)  
J. ZACHARY BALASKO  
(W. Va. State Bar No. 12954)  
Civil Division  
United States Department of Justice  
P.O. Box 875, Ben Franklin Station  
Washington, DC 20044-0875  
Telephone: (202) 616-0341  
Email: shane.huang@usdoj.gov

Attorneys for the United States

Respectfully submitted,

/s/Lex R. Smith  
LEX R. SMITH  
MARIA Y. WANG  
Kobayashi Sugita & Goda, LLP  
999 Bishop Street, 26th Floor  
Honolulu, Hawaii 96813  
Tel: 808-535-5700  
Fax: 808-535-5799  
lrs@ksqlaw.com

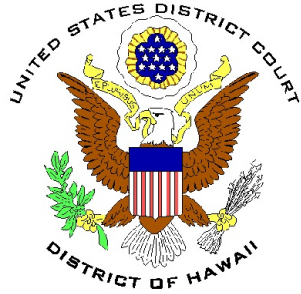
Attorneys for Sandwich Isles  
Communications, Inc.

/s/Albert S.N. Hee  
ALBERT S.N. HEE  
1155 Akipola Street  
Kailua, HI 96734

Pro se

APPROVED AS TO FORM.

DATED: Honolulu, Hawaii, October 13, 2022.



/s/ J. Michael Seabright  
J. Michael Seabright  
Chief United States District Judge

*United States of America v. Sandwich Isles Communications, Inc., et al.*, Civ. No. 18-00145 JMS-RT, Stipulation of Trial Procedures